

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

-----X
ENCOMPASS INSURANCE COMPANY OF
MASSACHUSETTS,

Plaintiff,

C.A. NO
05-11693 (RCL)

v.

JOSEPH D. GIAMPA, FREDERICK T. GIAMPA,
ADVANCED SPINE CENTERS, INC. d/b/a
FIRST SPINE & REHAB, FUTURE MANAGEMENT
CORPORATION, EDWARD KENNEDY, BRIAN
CULLINEY and JENNIFER McCONNELL,

Defendants.
-----X

**DEFENDANTS FREDERICK T. GIAMPA, JOSEPH D. GIAMPA, EDWARD
KENNEDY, FUTURE MANAGEMENT CORP. and ADVANCED SPINE
CENTERS, INC.'S UNOPPOSED MOTION FOR STAY OF PROCEEDINGS**

The Defendants, Frederick T. Giampa, Joseph D. Giampa, Edward Kennedy,
Future Management Corp. and Advanced Spine Center (hereinafter "Defendants")
respectfully request that this Honorable Court stay the proceedings of this action pending
resolution of the parallel criminal investigation/prosecution.

In support thereof, Defendants submit the attached Memorandum of Law.
Additionally, pursuant to Local Rule 7.1 (a) (2), counsel for Defendants has conferred
with counsel of record and no party to this action will oppose Defendants' Motion for
Stay of Proceedings.

WHEREFORE, the defendants respectfully request that the Court allow this
motion and stay the proceedings of the instant action as well as whatever other relief the
Court deems appropriate.

Respectfully submitted,
Frederick T. Giampa
Joseph D. Giampa
Edward Kennedy
Future Management Corp.
Advanced Spine Centers, Inc.
By counsel,

/s/ Matthew J. Conroy
Matthew J. Conroy (BBO# 566928)
MATTHEW J. CONROY & ASSOCIATES, P.C.
114 Waltham Street
Lexington, MA 02421
(781) 862-8060

August 12, 2008

CERTIFICATE OF SERVICE

I, Matthew J. Conroy, do hereby certify that a true and accurate copy of the foregoing pleading was served upon all counsel of record by ECF and 1st Class United States mail postage prepaid this 12th day of August 2008.

/s/ Matthew J. Conroy
Matthew J. Conroy